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MATTHEW T. GREGORY, ESQ.

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FILED

Clerk

District Court

JAN 18 2006

For The Northern Mariana Islands  
By \_\_\_\_\_

(Deputy Clerk)

**DAVID J. LUJAN, ESQ.**

**IGNACIO C. AGUIGUI, ESQ.**

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*Attorneys for Defendant World Corporation*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**YU SUK CHUNG,**

Plaintiff,

vs.

**WORLD CORPORATION,**

Defendant.

**CIVIL CASE NO. 04-00001**

**DECLARATION OF DAVID J. LUJAN IN  
SUPPORT OF NOTICE OF WITHDRAWAL  
AND EMERGENCY MOTION FOR AN  
ORDER DISCHARGING COUNSEL AND  
STAYING PROCEEDINGS**

I, David J. Lujan, declare as follows:

1. Ignacio C. Aguigui and I are partners in the Guam law firm of Lujan Aguigui & Perez LLP, and are co-counsel of record for World Corporation in this case. Our agreement to represent World Corporation ended in early December 2005, upon return of the verdict in this case, and since then, despite continued discussions and negotiations with World, no further

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1 agreements have been reached between us and World to govern our continued representation of  
2 World in this matter.

3 2. We are unable to continue our representation of World in this matter in the  
4 absence of an engagement agreement to govern such representation. Accordingly, we ask the  
5 Court to discharge us as counsel of record for World Corporation in this case as soon as possible.

6 3. I am aware of the Notice of Withdrawal and Emergency Motion for an Order  
7 Discharging Counsel and Staying Proceedings, filed on January 17, 2006, and signed by Mr.  
8 Aguigui, seeking the withdrawal and discharge of myself, Matthew Gregory, and Mr. Aguigui  
9 from the representation of World Corporation in this matter. The filing was submitted to the  
10 Court with my knowledge, concurrence, and consent.

11 I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct to the best of my knowledge and belief.

13 Executed this 16<sup>th</sup> day of January 2006 (Hawaii time) in Honolulu, Hawaii.

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15 \_\_\_\_\_  
16 DAVID J. LUJAN  
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